## PELUSO & TOUGER, LLP

70 LAFAYETTE STREET NEW YORK, NEW YORK 10013 PelusoandTouger.com

> Ph. No. (212) 608-1234 Fax No. (212) 513-1989

August 17, 2021 By ECF

Hon. Victor Marrero United States District Court Southern District of New York 500 Pearl Street, Suite 1610 New York, NY 10007-1312

> Re: <u>United States v. Rubin Ramirez</u>, 19 Cr 579(VM)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:\_\_\_\_\_\_\_\_
DATE FILED:\_\_\_\_\_\_8/18/21

Your Honor.

As the Court is aware Mr. Ramirez has been out on bail under the following conditions: Home detention secured by electronic monitoring, \$175,000 PRB, secured by 3 co-signers plus all standard conditions. I am now writing with the consent of the Government and Pre-Trial Services to modify the conditions of Mr. Ramirez' release in the following fashion:

- Modify Mr. Ramirez' condition of home detention to a curfew set by Pretrial Services, enforced by a location monitoring bracelet.
- Permitting temporary removal of the defendant's bracelet by pretrial services, to the extent necessary, for the defendant's own or his wife's scheduled medical appointments provided the removal of the bracelet is approved in advance by Pretrial Services.

Mr. Ramirez has been gainfully employed since his release on Bond and has not violated any of the conditions of his release. This modification is necessary for two reasons, the first is the medical condition of his wife, Claudia and Mr. Ramirez' having to help with that care. The second is so he can maintain his employment.

Thank you very much for your prompt attention to this matter.

Most Respectfully,
David Touger, Esq.

Request GRANTED.

Mr. Ramirez's bail conditions are modified as indicated above.

SO ORDERED.

8/18/2021

DATE

MCTOR MARRERO, U.S.D.I.